REMARKS

Herein, the "Action" or "Office Action" refers to the Final Office Action dated 3/11/2005.

Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-21, 24-33, 42, 45-51, 54-58 are presently pending. Claims amended herein are none. Claims withdrawn or cancelled herein are none. New claims added herein are none.

Substantive Claim Rejections

Office's Response to Previous Response

In the present Action (dated 3/11/2005), the Office indicated that Applicant's arguments from previous response (dated 10/27/2004) to the Office previous Action (which was dated 8/27/2004) were not persuasive.

However, the Office did not provide any additional information regarding the reasoning why Applicant's arguments were not persuasive. Instead, on pp. 2-3 of the present Action, the Office merely repeats verbatim the text of its original obvious rejection from the previous Action.

By responding in this manner, Applicant submits that the Office has not addressed some outstanding issues raised by Applicant in its response to the previous Action.

For example, the Office asserts that **Fields'** "HTML source" is equivalent to both the recited "input-description-data" and "the data structure." However, one or more of the claims recite a transformation of the "input-description-data" into the "data structure." Applicant submits that the Office still has not identified

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

where the cited references disclose such a transformation. In addition, the Office has not disclosed how the "HTML source" can be both the source data and the transformed data structure.

Furthermore, Applicant submits that neither references discloses the automatic generation of a "set of instructions" for filtering input. Instead, **Fields** discloses the automatic generation of "filter definitions," which are not instructions. **Fields** supports this interpretation because it discloses at col. 12, line 48 through col. 22, line 24 and U.S. Patent Application Serial No. 09/113,678, titled "Distribution Mechanism for Filtering, Formatting and Reuse of Web Based Content" (which is incorporated by reference into **Fields**), "filter definitions" are described not including commands, but rather as merely data.

Applicant submits that the Office has not explained how the Office can consider **Fields'** "filter definitions" to be the recited "set of instructions" when **Fields**, itself, indicates that its filter definitions include data instead of commands.

For the foregoing reasons, Applicant respectfully submits that the Office has not shown that the combination of the cited references discloses all of the claimed features and elements. Accordingly, Applicant asks that the Office withdraw its rejection of these claims.

Claim Rejections under §103

The Office rejects all of the pending claims under §103. For the reasons set forth below, the Office has not shown that rejected claims are obvious (under §103). Accordingly, Applicant respectfully requests that the rejections be withdrawn and the case be passed along to issuance.

The Office's rejections are based upon the following references:

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

- **Fields**: *Fields et al.*, US Patent No. 6,605,120 (issued Aug. 12, 2003);
- **Lynch**: *Lynch et al.*, US Patent No. 6,558,431 (issued May 6, 2003);
- **Motoyama**: *Motoyama et al.*, US Patent No. 6,085,196 (issued June 4, 2000).

Overview of the Application

The Application describes a technology for facilitating the automated generation of input-validation software filters. The Application describes at least one implementations that provides a convenient graphical user interface (GUI). With this GUI, a user is able to quickly enter a set of parameters defining valid inputs. Conversely, the parameters may define invalid input.

From the entered parameters, the implementation *automatically* generates input-validation filters for filtering input from computing components. With this implementation, the user does not manually generate filtering instructions *per se* – she only specifies a high-level description of what should be filtered, not how; thus, the user does not need to be familiar with any specific filtering language.

Cited References

The Office cites **Fields** as its primary reference and **Lynch** as it secondary reference in all of its obviousness-based rejections.

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324.9256
F: 509.323.8979
www.leehayes.com
lee&hayes

Fields

Fields describes a technology for automatically defining a filter used to extract web content for a web page, wherein the extracted content is used in a recast web page.

The recast web page may be produced by a hosting site, or may be part of an effort to revise a web site at a web content provider. First, a set of pages, possibly a single page, is retrieved from a content provider web server. Next, the web page is parsed to identify a set of selectable content elements. Next, a representation of the original web page is presented in a user interface, wherein the selectable content elements are demarcated. The user will select some of the elements for inclusion in the filter through the user interface, whereby the tool will indicate the selected content elements for inclusion in the filter.

Fields discloses the construction of the filter so that when the filter is used, the selected content elements are extracted from a retrieved web page from the content provider web server and reused in the recast web page. As part of the process of identifying the selectable content elements, a set of varied headers can be used to retrieve multiple versions of the same web page. In this way, the multiple versions of the web page are compared to identify static and dynamic content elements and marked as static or dynamic.

Lynch

Lynch describes an editor for allowing web authors to edit HTML visually while preserving the HTML source document.

The editor preserves the structure and format of the HTML, and permits simultaneous modeless visual and source document editing. When an edit is made

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

with the invention, only the HTML source around that edit is updated, rather than rewriting the whole HTML source document.

Furthermore, when an edit is made, the new HTML source code is outputted in a format that is specified by the user. In order to preserve the format of the document, format information is stored in the parsed tree. The format of the node is preserved when its source is regenerated; edits to the node will reformat it according to user preferences. In order to preserve the structure of the document, invalid HTML structures are maintained and not corrected.

The editor will either support the invalid structure by reflecting such structure in the parsed tree, and thus allow for editing of the structure, or the invention will not support such a structure, and represent such structures as invalid nodes. Moreover, the editor also maintains structure while editing, as the structure and format of the document is only minimally modified during editing, i.e. only the nodes affected by the edits are restructured and reformatted, and the remainder of the document is unmodified

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324.9256
F: 509.323.8979
www.leehayes.com
lee&hayes

Obviousness Rejections

Lack of *Prima Facie* Case of Obviousness (MPEP § 2142)

Applicant disagrees with the Office's obviousness rejections. Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a *prima facie* case have not been met.

The Office rejects claims 1-4, 6-20, 22-36, and 38-58 under USC § 103(a) as being unpatentable over by **Fields** in view of **Lynch**. Furthermore, the Office rejects claims 5, 21, and 37 under USC § 103(a) as being unpatentable over by **Fields** in view of **Lynch** and further in view of **Motoyama**.

Applicant respectfully traverses the rejections of these claims. For the foregoing reasons, Applicant asks the Office to withdraw its rejections of these claims.

Claims 1, 19, 42, 50, and 54

With Office's cites to the references provided in brackets, amended claim 1 recites:

> obtaining input-description-data, **[Fields, col. 5, lines 15-25]** which define the properties of valid input directly provided by a computing component without human intervention; **[Lynch, col. 3, lines 30-60]**
>
> transforming the input-description-data into a data structure, wherein the data structure is an organized representation of the input-description-data; **[Fields, col. 5, lines 15-25]**
>
> ~~with~~ from the organized representation of the input-description-data of the data structure, **[Fields, col. 5, lines 20-25]** automatically generating a set of instructions for filtering input directly provided by a computing component without human intervention **[Fields, col. 5, lines 1-**

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

30] based upon the properties of valid input defined by the input-description-data. **[Lynch, col. 3, lines 30-60]**

With Office's cites to the references provided in brackets, amended claims 19 and 50 recites:

obtaining input-description-data. **[Fields, col. 5, lines 15-25]** which define the properties of valid input provided by a computing component; **[Lynch, col. 3, lines 30-60]**

transforming the input-description-data into a data structure; **[Fields, col. 5, lines 15-25]**

storing the data structures in a persistent form;

automatically generating a set of instructions for filtering input provided by a computing component based upon the properties of valid input defined by the input-description-data, **[Fields, col. 5, lines 1-30]** wherein the generating acquires the properties for generating the set of instructions from the data structure. **Fields, col. 5, lines 20-25]**

With Office's cites to the references provided in brackets, amended claim 42 recites:

an user interface for obtaining input-description-data, **[Fields, col. 5, lines 15-25]** which define the properties of valid input provided by a computing component; **Lynch, col. 3, lines 30-60]**

a transformer configured to transform the input-description-data into a data structure; **[Fields, col. 5, lines 15-25]**

a memory, wherein the memory is configured to store the data structure;

a filter-instructions automatic generator ("autogen") configured to automatically generate a set of instructions for filtering input provided by a computing component **[Fields, col. 5, lines 1-30]** based upon the properties of valid input defined by the input-description-data, wherein the

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

filter-instructions autogen is further configured to acquire the properties from the data structure when automatically generating the set of instructions.**[Fields, col. 5, lines 20-25]**

With Office's cites to the references provided in brackets, claim 54 recites:

> obtaining input-description-data, **[Fields, col. 5, lines 15-25]** which define the properties of valid input provided by a computing component; **[Lynch, col. 3, lines 30-60]**
>
> automatically generating a set of instructions for filtering input provided by a computing component based upon the properties of valid input defined by the input-description-data. **[Fields, col. 5, lines 1-30]**

Applicant submits that the combination of **Fields** and **Lynch** does not disclose all of the elements and features of the rejected claims. In particular, the combination of the cited references does not disclose input-description-data being transformed into a "data structure" which become the source of generated instructions and an automatic generation of a set of instructions.

For example, Applicant submits that neither reference discloses:

- "from the organized representation of the input-description-data of the data structure, automatically generating a set of instructions..." [claim 1];
- "wherein the generating acquires the properties for generating the set of instructions from the data structure." [claims 19, 50, and 54]
- "wherein the filter-instructions autogen is further configured to acquire the properties from the data structure when automatically generating the set of instructions" [claim 42]

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

In addition, Applicant submits that neither reference discloses the automatic generation of a set of instructions for filtering input. Instead, Fields discloses the automatic generation of "filter definitions," which are not instructions.

FROM the data structure

The combination of the cited references does not disclose the "input-description-data" being transformed into a "data structure" which become the source of generated instructions. Rather, the references disclose an "HTML source" being transformed into an "HTML template", but the HTML template is not the source for generation of "filter definitions."

However, Applicant submits that **Fields** does not generate its "filter definitions" from the "HTML template." Rather, **Fields** generates its "filter definitions" from parsing of the "HTML source." In col. 9, lines 58-64, **Fields** discusses "filter definition" creation [with emphasis added]:

> The document filters can be created through several methods, including the analysis of the HTML source code, imbedded comments or delimiters and through comparisons with similar documents. Once the style of the web site is understood, a filter can be developed to look for the portion of the original document in which the hosting site is interested in reformatting.

Applicant submits that **Fields'** "filter definitions" are not produced by **Fields** from its "HTML template", rather the definitions are produced by parsing its "HTML source." Therefore, **Fields** does not disclose what these claims recite.

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

Set of Instructions ≠ Filter Definition

Fields discloses the generation of "filter definitions." These claims recite the generation of a "set of instructions." Applicant submits that **Fields'** "filter definitions" are not the same as the recited "set of instructions."

As discussed by **Fields** from col. 12, line 48 through col. 22, line 24 and by U.S. Patent Application Serial No. 09/113,678, entitled "Distribution Mechanism For Filtering, Formatting and Reuse of Web Based Content" (which is incorporated by reference into **Fields**), "filter definitions" are data and not a set of commands (which a "set of instructions" is).

Applicant submits that **Fields'** "filter definitions" are not a "set of instructions" as recited in the claims, rather the definitions are data and information.

Applicant respectfully submits that the Office has not shown that the combination of the cited references discloses all of the claimed features and elements. Accordingly, Applicant asks that the Office withdraw its rejection of these claims.

Claims 2-18

These claims ultimately depend upon independent claim 1. As discussed above, claim 1 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

Claims 20, 21, 24-33

These claims ultimately depend upon independent claim 19. As discussed above, claim 19 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

Claims 46-49

These claims ultimately depend upon independent claim 42. As discussed above, claim 42 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

Claim 51

This claim ultimately depends upon independent claim 50. As discussed above, claim 50 is allowable.

In addition to its own merits, this dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of this dependent claim because its base claim is allowable.

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes

Claims 55-58

These claims ultimately depend upon independent claim 54. As discussed above, claim 54 is allowable.

In addition to its own merits, each of these dependent claims is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each of these dependent claims because its base claim is allowable.

lee&hayes
421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com

Dependent Claims

In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that the Office withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Office is urged to contact the undersigned attorney before issuing a subsequent Action.

Respectfully Submitted,

Dated: 6-13-05 By: _____

Kasey C. Christie
Reg. No. 40559
(509) 324-9256 x232
kasey@leehayes.com
www.leehayes.com

421 West Riverside, Suite 500
Spokane, WA 99201
P: 509.324-9256
F: 509.323-8979
www.leehayes.com
lee&hayes